

PATENT
Attorney Docket No. 00-5016
Application Serial No. 09/772,759

REMARKS

Claims 1-46 are pending in this application, with claims 1, 10, 21, 32 and 38 being independent. Claims 10-20 have been amended. Favorable reconsideration is respectfully requested.

The Office Action objected to the language of Claims 1 and 38 as having some informalities. Applicants submit that the phrase "to effect" has been used as intended and has been used correctly under the rules of English grammar. "To effect" has been used in the sense "to cause to come into being". *Webster's Ninth New Collegiate Dictionary* (1986) at p. 397. As recited in Claims 1 and 38, allowing a user to interface with the graphical representation causes to come into being a mapping between the frame and telecommunications lines leading to and from the frame. Replacing "to effect" in Claims 1 and 38 with "that affects," as suggested by the Examiner, would restrict the meaning of graphical representation as one that "influences" a mapping, *id.* at 61, which is not the Applicants' intent. In this regard, Claims 4 and 41, for example, further provide for allowing the user to modify attributes of the selected frame. Thus while a user can interface with a graphical representation and in so doing affect the attributes of a mapping, the use of the phrase "to effect" is intended to be used in the broader sense. Accordingly, Applicants respectfully submit that a modification to Claims 1 and 38 is not required.

Claims 10-20 were rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter. Without conceding the propriety of the rejections, Claims 10-20 have been amended in an effort to expedite the allowance of this application.

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Claims 1-8 and 38-45 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,363,421 (*Barker et al.*), Claims 32, 36 and 37 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,523,022 ("*Hobbs*"), Claims 9 and 46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Barker et al.* in view of U.S. Patent No. 5,553,083 ("*Miller*"), Claims 10-19, 21-31 and 33-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Barker et al.* in view of *Hobbs*, and Claims 20 and 31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Barker et al.* in view of *Hobbs and Miller*. These rejections are respectfully traversed.

As recited in independent Claim 1, the present invention relates to a method of presenting to a user a visual representation of a frame resident at a central office of a telecommunications system including accessing a database including data as to a current condition of the frame, and displaying, based on the accessed data, a graphical representation of the frame. The graphical representation includes a visual indication of the current condition of the frame. The method further includes allowing a user to interface with the graphical representation to effect a mapping between the frame and telecommunications lines leading to and from the frame.

Independent claim 38 is similar to claim 1, but is drafted in means-plus-function form. Independent claims 10 and 32 are directed to computer executable software code for host and client computers, respectively, that perform a method having the same features as those recited in claim 1.

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Independent claim 21 is directed to a server computer having similar features to those recited in claim 1, as well as additional features. The computer server of claim 21, for example, is operable to communicate with a client computer on a network, process requests from the client computer for information relating to one or more frames, initiate database interface code which retrieves the requested data from the database and formats a graphical representation of a current condition of the frames in the request. The computer server is further operable to communicate the formatted graphical representation of the one or more frames to the client computer and allow a user of the client computer to interface with the graphical representation to effect a mapping between the frame and telecommunications lines leading to and from the frame.

Barker et al., relates to a method for remotely managing a plurality of network elements of a telecommunications network through a special communication link. *Barker et al.* teaches using Web pages, such as the one illustrated in FIG. 10 to view network element status. In particular, FIG. 10 is a page showing the high-level network status of various Application Processor (AP) network elements. As discussed above, the present invention involves visual representations of a frame resident at a central office of a telecommunications system. Nothing has been found in *Barker et al.* that would teach or suggest presenting to a user a visual representation of such a frame. Nor has anything been found in *Barker et al.* that would teach or suggest accessing a database including data as to a current condition of the frame, displaying, based on accessed data a graphical representation including a visual indication of the current condition of the frame, much less allowing a user to interface with the graphical representation of

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the frame to effect a mapping between the frame and telecommunications lines leading to and from the frame, as recited in Claim 1.

In addition, Applicants respectfully submit that Claim 1, when read (as the law requires that they be read) in light of the specification, is sufficiently clear such that one of ordinary skill in the relevant art would understand with the legally-required degree of certainty the scope of this claim. Particularly, as explained at page 2 of the specification, a frame is a physical structure located within a central office (CO) of a telecommunications company (telco), laid out in a matrix of blocks, each of which includes a matrix of pins. Figures 3-8 show exemplary frames. Nothing in *Barker et al.* has been found that would teach or suggest a frame as recited in Claim 1.

Accordingly, Applicants submit that Claim 1 is clearly allowable over *Barker et al.*

Hobbs relates to systems and methods of retrieving information from databases. Apparently, when a user clicks on a hyperlink contained in on a Document Server, an application on an Application Server will automatically return a set of frames or inline frames, dynamic

framesets, layers or fixed or floating pop-up windows, or any combination of the foregoing described in the Hypertext Markup Language (or HTML), as explained at Col. 12, Ins. 15-26.

Hobbs does not at all relate to presenting to a user a visual representation of a frame resident at a central office of a telecommunications system, as defined in Claim 32. In addition, as explained above with respect to Claim 1, a frame is defined in the specification as a physical structure located within a CO of a telco. Nothing has been found in *Hobbs* that would teach or suggest

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computer code running on a computer communicating with, sending requests to, or receiving from a server on a network, as recited in Claim 32.

Accordingly, Applicants submit that Claim 32 is clearly allowable over *Hobbs*.

As explained above, Claims 10, 21 and 38 are similar to Claim 1 and 32, but are directed to computer executable software code for a host, or drafted in apparatus or means-plus-function form, respectively. Accordingly, independent claims 10, 21 and 38 are allowable for the same reasons as discussed above with respect to Claims 1 and 32.

Applicants submit that a combination of *Barker et al.* and *Hobbs*, assuming such combination would even be permissible, would fail to teach or suggest a host computer or server as recited in Claims 10 and 21 for the same reasons as discussed above with reference to Claims 1 and 32.

The remaining claims all depend from one of independent Claims 1, 10, 21, 32 and 38 and each partakes in the novelty and non-obviousness of its respective base claims. The dependent claims also recite additional patentable features of the present invention, and individual reconsideration of each is respectfully requested.

The other applied references do not correct the deficiencies of *Barker et al.* or *Hobbs et al.* *Miller* relates transmission of files from a server to one or more clients over communications links and does not teach or suggest the apparatus or functions of the present invention discussed above.

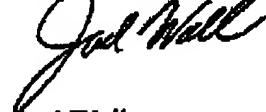
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CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 07-2347. If an extension of time under 37 C.F.R. § 1.136 not accounted for above is required, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,



Joel Wall
Reg. No. 25,648

Date: February 5, 2004

c/o Christian R. Andersen
VERIZON CORPORATE SERVICES GROUP, INC.
HQE03H14
600 Hidden Ridge Drive
Irving, TX 75038
(972) 718 - 4800

Customer Number 32127

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